

Message

From: Wright, Tracy [Wright.Tracy@epa.gov]
Sent: 11/6/2017 4:31:02 PM
To: Bauer, Jeff [Bauer.Jeff@epa.gov]; Nguyen, Nhan [Nguyen.Nhan@epa.gov]; Eisenreich, Karen [Eisenreich.Karen@epa.gov]
Subject: RE: P-16-0400

Jeff and all,

Please see below. I don't think this would be appropriate- to discuss a PMN at a conference directly with the submitter. I'm not sure who to forward this to, but I'm not comfortable responding to the submitter.

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From: Delina.Lyon@shell.com [mailto:Delina.Lyon@shell.com]
Sent: Friday, November 03, 2017 1:59 PM
To: Wright, Tracy <Wright.Tracy@epa.gov>
Subject: RE: P-16-0400

Hi Tracy,

How are you doing? I had spoken with Jeff Bauer a few weeks ago regarding the PMN for Shell's GTL Solvent GS 1927 (P-16-0400). He mentioned that you were still working on testing recommendations for us, but that you and I could have an informal conversation at some point. I will be at SETAC North America in a couple of weeks, and I was wondering if we could have a quick conversation during a coffee break.

Thank you!

Kind regards,
Del Lyon

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From: Lyon, Delina SHLOIL-SHG/PE
Sent: Tuesday, September 19, 2017 1:27 PM
To: 'Wright.Tracy@epa.gov' <Wright.Tracy@epa.gov>
Subject: P-16-0400

Hello Tracie,

I hope this email finds you well. We met a couple of years ago at SETAC, and I learned recently that you are the ecotoxicologist on a PMN that we submitted last year (P-16-0400), for which Jeff Bauer is the case manager. Jeff indicated to our product steward, Melissa Ford, that I could discuss questions with you directly, so I hope you don't mind my reaching out to you.

To summarize, on June 6, 2016, Shell Oil Company submitted a PMN (P-16-0400) for a C11-16 Gas-to-Liquid (GTL) Solvent, termed GS 1927. No aquatic toxicity test data on GS 1927 was submitted; however, a read-across argument was made using testing data for analogous GTL solvents (see table below). All of the GTL substances are fractionates from a common feedstock - GTL Diesel/Gas Oil. GS 1927 is, in effect, equivalent to GS 190, GS 215 and GS 250 combined (all recently placed on TSCA inventory, PMN P-14-132 thru 136). Based on the chronic aquatic toxicity testing undertaken at the behest of EPA on GS 190 and GS 170, the PMNs P-14-132 thru 136 were dropped in 2015. We used the same chronic aquatic toxicity testing data as well as other information to support the registration of GS 1927 (P-16-0400).

Shell GTL Solvent	Chemical name	CAS Number	On TSCA Inventory
GTL Gas Oil	Distillates (Fischer-Tropsch), C8 – C26, branched and linear	848301-67-7	Y
GS160	Alkanes, C8-11-branched and linear	1437281-13-4	Y
GS170	Alkanes, C9-12-branched and linear	1437281-04-3	Y
GS190	Alkanes, C10-13-branched and linear	185857-36-7	Y
GS210	Alkanes, C9-13-branched and linear	1437280-84-6	Y
GS215	Alkanes, C12-15-branched and linear	1437281-03-2	Y
GS250	Alkanes, C14-16-branched and linear	1174918-46-7	Y
GS270	Alkanes, C15-19-branched and linear	1437281-01-0	Y
GS310	Alkanes, C18-24-branched and linear	1437280-85-7	Y
GS1927	Alkanes, C11-16 branched and linear	1809170-78-2	subject of this PMN

I was wondering if you've had a chance to review this read-across document, which was submitted with the PMN package. After the focus review, Jeff had indicated that Shell would need to perform a chronic aquatic toxicity base set for GS 1927, but he did not provide any feedback on whether the read-across document was reviewed or why it was not accepted.

I look forward to hearing from you. I will also be at SETAC this year, so I hope to get to see you there. Thank you for your time!

Kind regards,
Del

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